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8 *Attorneys for Plaintiffs*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 RAYMOND PELOSI, an individual;
12 UNITED STORAGE TECHNOLOGIES
13 INC., a Nevada Corporation

14 Plaintiff,

15 v.

16 DOLLAR GENERAL CORPORATION, a
17 Tennessee Corporation; JOHN DOES 1 –
18 10; ROE CORPORATIONS 1 – 10.

19 Defendant.

Case No. 2:20-cv-01635-RFB-EJY

**Stipulation to Continue Briefing
Deadlines**

20 Plaintiffs Raymond Pelosi and United Storage Technologies Inc. (“Plaintiffs”), by and
21 through their attorneys Evan D. Schwab, Esq. of Schwab Law Firm PLLC (“SLF”) and
22 Defendant Dollar General Corporation (“Defendant”) Brian Pezzillo, Esq. of Howard &
23 Howard Attorneys PLLC, hereby file this Stipulation to Continue Briefing Deadlines as
24 follows.

25 This Stipulation is entered into for the following reasons:

- 26 1. Defendant filed a Motion to Dismiss and Memorandum of Points and Points and
27 Authorities in Support (“Motion”) on December 21, 2020. Plaintiffs’ Response to
28 the Motion is presently due on or before January 4, 2021.
2. The Motion was filed just prior to Christmas, New Years and the Winter Holiday.
Additionally, the schedule and obligations of Counsel in this matter warrant a
brief extension of time for the filing of the Response in this Matter. Counsel
propose that the Response be due on or before January 11, 2021. Plaintiffs’

Counsel will extend any similarly requested professional Courtesy with regard to any Reply in Support of Motion.

3. No Trial date has been set in this matter and the instant extension would not cause undue delay, prejudice or otherwise to any of the Parties to this action. No formal hearing date has been set on the Motion.

4. This Stipulation is entered into in good faith.

Dated this 4th day of January 2021

Schwab Law Firm PLLC

/s/ Evan Schwab

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Attorneys for Plaintiffs Raymond Pelosi & United Storage Technologies, Inc.

Dated this 4th day of January 2021

Howard & Howard Attorneys PLLC

/s/ Brian Pezzillo

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Attorneys for Defendant Dollar General Corporation

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RAYMOND PELOSI, an individual;
UNITED STORAGE TECHNOLOGIES
INC., a Nevada Corporation

Plaintiff,

v.

DOLLAR GENERAL CORPORATION, a
Tennessee Corporation; JOHN DOES 1 –
10; ROE CORPORATIONS 1 – 10.

Defendant.

Case No. 2:20-cv-01635-RFB-EJY

**Stipulation to Continue Briefing
Deadlines**

Findings of Fact

Based on the Stipulation to Continue Briefing Deadlines filed by Counsel for the Parties, and good cause appearing therefore, the Court finds that:

1. Defendant filed a Motion to Dismiss and Memorandum of Points and Authorities in Support (“Motion”) on December 21, 2020. Plaintiffs’ Response to the Motion is presently due on or before January 4, 2021.
2. The Motion was filed just prior to Christmas, New Years and the Winter Holiday. Additionally, the schedule and obligations of Counsel in this matter warrant a brief extension of time for the filing of the Response in this Matter. Counsel propose that the Response be due on or before January 11, 2021. Plaintiffs’ Counsel will extend any similarly requested professional Courtesy with regard to any Reply in Support of Motion.
3. No Trial date has been set in this matter and the instant extension would not cause undue delay, prejudice or otherwise to any of the Parties to this action. No formal hearing date has been set on the Motion.
4. This Stipulation is entered into in good faith.

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Conclusions of Law

Federal Rule of Civil Procedure 6(b) et seq. permits the Court to extend the time for briefing under including, but not limited to, the following circumstances: “with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires...” In the instant matter Counsel have submitted a Stipulation to continue the briefing deadlines and good cause appears.

Order

IT IS SO ORDERED that Plaintiffs’ Response to Defendant’s Motion to Dismiss and Memorandum of Points and Authorities in Support (“Motion”) will be due on or before January 11, 2021.

Dated this 4th day of January 2021



RICHARD E. BOULWARE, II
United States District Court